

**ORIGINAL**

David N. Wynn, Esq. (DW 8884)  
 ARENT FOX LLP  
 Attorneys for Defendant  
 The Ritz Carlton Hotel Company, L.L.C.  
 1675 Broadway, 32<sup>nd</sup> Floor  
 New York, New York 10019  
 (212) 484-3900  
 wynn.david@arentfox.com

Barbara S. Wahl, Esq. (pro hac vice application to be filed)  
 ARENT FOX LLP  
 Attorneys for Defendant  
 The Ritz Carlton Hotel Company, L.L.C.  
 1050 Connecticut Avenue, NW  
 Washington, DC 20036-5339  
 (202) 857-6000  
 wahl.barbara@arentfox.com

**UNITED STATES DISTRICT COURT  
 FOR THE SOUTHERN DISTRICT OF NEW YORK**

**CLINIQUE LA PRAIRIE, S.A.,**

**Plaintiff,**

**-against-**

**THE RITZ CARLTON HOTEL  
 COMPANY, L.L.C.,**

**Defendant.**

**Case No. 1:07-cv-04038 (PAC)**

**NOTICE OF MOTION BY  
 DEFENDANTS FOR ADMISSION  
 PRO HAC VICE OF  
 BARBARA S. WAHL**

**PLEASE TAKE NOTICE** that upon the annexed Affidavit of David N. Wynn,

sworn to on June 12, 2007, the Affidavit of Barbara S. Wahl, sworn to on June 11, 2007,

together with the certificates of good standing of Barbara S. Wahl attached hereto, the undersign

shall move this Court, before the Honorable Paul A. Crotty, United States District Judge, at the

United States District Court , Southern District of New York, 500 Pearl Street, New York, New

York, at such date and time as the Court directs, for an order pursuant to Local Civil Rule 1.3(c)

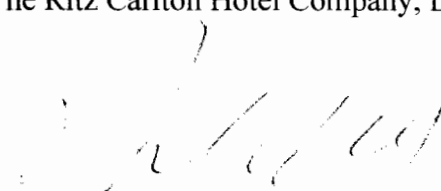
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of this Court, admitting Barbara S. Wahl to the bar of this Court *pro hac vice* for the purpose of making appearances in this action on behalf of The Ritz Carlton Hotel Company, L.L.C.

Dated: June 11, 2007  
New York, New York



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David N. Wynn, Esq. (DW 8660)  
ARENT FOX LLP  
Attorneys for Defendant  
The Ritz Carlton Hotel Company, L.L.C  
1675 Broadway, 32<sup>nd</sup> floor  
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(202) 857-6000

To: Milton M. Ferrell, Jr., Esquire  
George G. Mahfood, Esquire  
FERRELL LAW, P.A.  
598 Madison Avenue  
New York, New York 10022  
*Attorney for Plaintiff*

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wahl.barbara@arentfox.com

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CLINIQUE LA PRAIRIE, S.A., )  
 )  
 ) **Plaintiff,** )  
 )  
 ) **-against-** ) **Case No. 1:07-cv-04038 (PAC)**  
 )  
 ) **THE RITZ CARLTON HOTEL** )  
 ) **COMPANY, L.L.C.,** )  
 )  
 ) **Defendant.** )  
 )  
 )  
 \_\_\_\_\_ )  
 STATE OF NEW YORK )  
 ) ss:  
 COUNTY OF NEW YORK )

DAVID N. WYNN, being duly sworn, hereby deposes and says as follows:

1. I am a member of Arent Fox LLP (“Arent Fox”) attorneys for Defendant, The Ritz Carlton Hotel Company, L.L.C. in the above-captioned matter. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set

forth herein and in support of Defendants' Motion to admit Barbara S. Wahl as counsel *pro hac vice* to represent Defendant in this matter.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in the June Term of 1981, in the State of New York, Appellate Division Second Department. I am also admitted to the bar of the United States District Court for the Southern District of New York and am in good standing with this Court

3. I have known Barbara S. Wahl since 1991. I submit this affidavit in support of the application pursuant to Rule 1.3(c) of the Local Rules of the United States District Court of the Southern District of New York for an order permitting Barbara S. Wahl to appear as counsel *pro hac vice* on behalf of defendant in this action

4. Barbara S. Wahl is a member of Arent Fox LLP, located at 1050 Connecticut Avenue, N.W., Washington, D.C. 20036-5339.

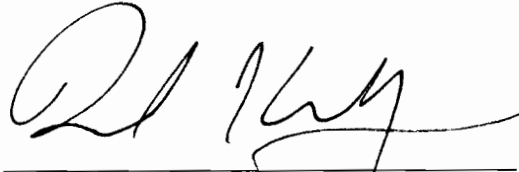
5. I have found Ms. Wahl to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure

6. Accordingly, I am pleased to move the admission of Barbara S. Wahl, *pro hac vice*.

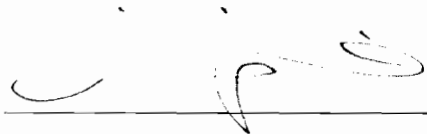
7. I respectfully submit a proposed order granting the admission of Barbara S. Wahl, *pro hac vice* which is attached hereto as Exhibit B.

WHEREFORE, it is respectfully requested that this Court enter an Order granting the admission *pro hac vice* of Barbara S. Wahl to represent Defendant The Ritz Carlton Hotel Company, L.L.C., in the above-captioned matter.

Dated: June 11, 2007  
New York, New York

  
\_\_\_\_\_  
DAVID N. WYNN

Sworn to be before me this 12<sup>th</sup> day of June, 2007

  
\_\_\_\_\_  
Notary Public, State of New York

**Nicholas P. Pavlidis**  
**Notary Public, State of New York**  
**No. 02PA6160212**  
**Qualified in New York County**  
**Commission Expires 1/29/2011**

David N. Wynn, Esq. (DW 8884)  
ARENT FOX LLP  
Attorneys for Defendant  
The Ritz Carlton Hotel Company, L.L.C.  
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**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<b>CLINIQUE LA PRAIRIE, S.A.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>-against-</b>	)	<b>Case No. 1:07-cv-04038 (PAC)</b>
	)	
<b>THE RITZ CARLTON HOTEL COMPANY, L.L.C.,</b>	)	
	)	
<b>Defendant.</b>	)	
	)	

**AFFIDAVIT OF BARBARA S. WAHL IN SUPPORT OF  
APPLICATION FOR ADMISSION *PRO HAC VICE***

BARBARA S. WAHL, being duly sworn, hereby deposes and says as follows:

1. I am a member of Arent Fox LLP (“Arent Fox”) attorneys for Defendant, The Ritz-Carlton Hotel Company, L.L.C. I respectfully submit this affidavit in support of the motion for my admission pro hac vice pursuant to Local Civil Rule 1.3 (c) of the Local Rules for the

United States District Court for the Southern District of New York, for the purpose of making appearances on behalf of Defendant, The Ritz-Carlton Hotel Company, L.L.C in this action.

2. I am admitted to practice in, and am a member in good standing of the Bars of Virginia and the District of Columbia. Certificates of good standing certifying my status as a member of the Virginia and District of Columbia Bars are attached to this Affidavit as exhibit A.

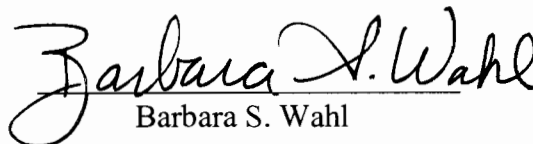
3. I have never been the subject of disciplinary action by the bars or courts of any jurisdiction in which I am licensed.

4. I have never been denied admission to any court to which I have applied.

5. My office address, telephone number and telecopier number are as follows: 1050 Connecticut Avenue, NW, Washington, DC 20036-5339, Tel: No.: (202) 857-6000, Fax No.: (202) 857-6395, wahl.barbara@arentfox.com.

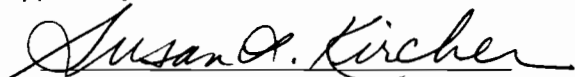
WHEREFORE, it is respectfully requested that this Court enter an Order granting my admission pro hac vice to represent Defendant The Ritz-Carlton Hotel Company, L.L.C in this matter.

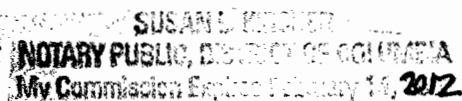
Dated: June 11, 2007

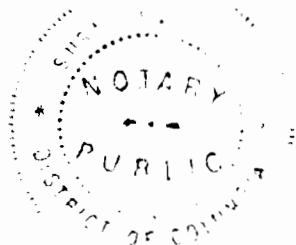
  
Barbara S. Wahl

The District of Columbia

Sworn to be before me this  
11<sup>th</sup> day of June, 2007

  
Notary Public, District of Columbia

  
NOTARY PUBLIC, DISTRICT OF COLUMBIA  
My Commission Expires February 14, 2012





District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia  
Court of Appeals, do hereby certify that


BARBARA SUSAN WAHL

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was on the 17<sup>TH</sup> day of DECEMBER, 1979  
duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on June 5,  
2007.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk



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George W. Chabalewski  
Bar Counsel



# Virginia State Bar

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707 East Main Street, Suite 1500  
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Telephone: (804) 775-0500

Facsimile: (804) 775-0501 TDD: (804) 775-0502

Thomas A. Edmonds  
Executive Director and  
Chief Operating Officer

Mary Yancey Spencer  
Deputy Executive Director

Elizabeth L. Keller  
Assistant Executive Director  
for Bar Services

Susan C. Busch  
Assistant Executive Director  
for Administration

*June 1, 2007*

## ***CERTIFICATE OF GOOD STANDING***

*THIS IS TO CERTIFY THAT **BARBARA SUSAN WAHL** IS AN ACTIVE  
MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING. **MS.**  
**WAHL** WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON **APRIL 23,**  
**1985, AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN**  
**BY THE VIRGINIA BOARD OF BAR EXAMINERS.***

*SINCERELY,*

A handwritten signature in black ink, reading "Thomas A. Edmonds".

THOMAS A. EDMONDS  
EXECUTIVE DIRECTOR AND  
CHIEF OPERATING OFFICER

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<b>CLINIQUE LA PRAIRIE, S.A.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>-against-</b>	)	<b>Case No. 1:07-cv-04038 (PAC)</b>
	)	
<b>THE RITZ CARLTON HOTEL COMPANY, L.L.C.,</b>	)	
	)	<b>PROPOSED ORDER</b>
<b>Defendant.</b>	)	
	)	

UPON the motion by Arent Fox LLP, attorneys for Defendant, The Ritz Carlton Hotel Company, L.L.C, for the *pro hac vice* admission of Barbara S. Wahl, Affidavits David N. Wynn and Barbara S. Wahl in support.

ITS IS HEREBY ORDERED that, Barbara S.Wahl, Esq. of ARENT FOX LLP 1050 Connecticut Avenue, NW, Washington, DC 20036-5339, telephone number (202) 857-6000, e-mail address [wahl.barbara@arentfox.com](mailto:wahl.barbara@arentfox.com), is admitted to practice *pro hac vice* as counsel for, Defendant, The Ritz Carlton Hotel Company, L.L.C. in the above captioned case in the United the United Stated District Court for the Southern District of New York

All attorneys appearing before this court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned the Electronic Case Filing (ECF) System, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov).

IT IS SO ORDERED

Dated: \_\_\_\_\_, 2007

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U.S. District Judge

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

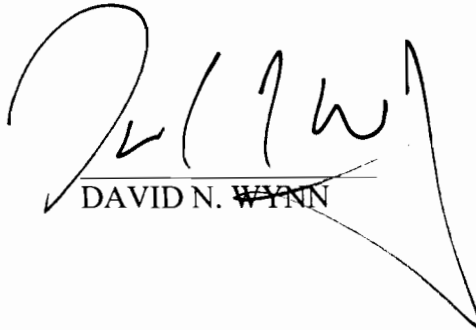
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CLINIQUE LA PRAIRIE, S.A.,	:	
	:	Civil Action No:
Plaintiff,	:	07 CV 4038 (PC)
	:	
-against-	:	
	:	
THE RITZ-CARLTON HOTEL COMPANY, LLC,	:	
	:	
Defendant.	:	
-----X	:	

I certify that on June 12, 2007, I caused to be served a true and correct copy of the attached Notice of Motion By Defendants for Admission *pro hac vice* of Barbara S. Wahl, with Affidavits in support and Proposed order attached by first-class mail postage prepaid upon:

Milton M. Ferrell, Jr., Esquire  
George G. Mahfood, Esquire  
FERRELL LAW, P.A.  
598 Madison Avenue  
New York, New York 10022  
*Attorney for Plaintiff*

which address has been designated for receipt of service.

Dated: New York, New York  
June 12, 2007

  
\_\_\_\_\_  
DAVID N. WYNN